The burden placed upon small market broadcasters and in our situation, small market non-profit educational broadcasters, will be enormous should the Commission decide to record all programs in the dayparts outlined in the proposed rulemaking.

For example, our stations air much programming provided by other parties (such as talk shows, music shows, teaching programs, etc.). Stations should not be required to record any part of their program day that is supplied by outside parties.

It is my contention that small market and educational broadcasters will be hit the hardest in the personnel and money required to record all broadcasts and then retain the recordings. It is very difficult for listener-supported small market stations to operate now. The added financial burden is unwarranted.

At best, if the Commission deems it necessary for any recording by the station, such recording should be only for local programs produced by the local station.

I am of the opinion, however, that no recording is necessary and that the imposition of such recording will be a nightmare for the broadcaster.

I ask you to reject the idea of compulsory recording of any radio station's programming.

Dr. Kenneth C. Hill President Appalachian Educational Communication Corporation